

I oppose loosening the rules designed to promote and protect diversity of media ownership. These rules were adopted to ensure that the public would receive a diverse range of viewpoints from the media, and not simply the opinions of a handful of media conglomerates.

In my comments, I want to address two arguments circulating at the FCC in the current review of ownership rules: (1) First, the proliferation of channels in the commercial television system necessarily means the television industry is more competitive; than in the past; and (2) Second, that the proliferation of channels has resulted in increased diversity of expression and a wide range of political opinions within the US television industry.

The first argument can be dismissed out of hand. The recent proliferation of channels on cable/satellite television belies the more fundamental consolidation of the television industry into the hands of just a few multinational media empires. AOL/Time Warner owns not only the WB network, but also HBO, CNN, TBS, and TNT (among others). Disney owns not only ABC but also The Disney Channel, A&E, and ABC Family (among others). Viacom owns not only CBS but also MTV, VH-1, and TNN (among others). The News Corporation owns its own stable of cable stations. To be sure, we can surf to more channels on the dial, but the channels themselves are owned collectively by a small oligopoly of firms. What's more, these firms use their television outlets (both cable and broadcast) to promote cultural products produced in other arms of the firm. So Disney will produce (or buy the rights to) Alias; and then air the re-runs on ABC family to open up one more revenue stream!

for their investment. This practice, however synergistic; for Disney, does not add to the diversity of the American media environment. It represents more of the same, broadcast on different channels.

The second argument is more complex. The emergence of cable (and then satellite) television may have created more channels, but the result has not enriched the diversity of information and entertainment on the dial. Just the opposite. An increase in channels spreads audiences; and therefore advertising dollars; across more outlets. This has forced individual channels to jump through hoops to attract and please advertisers (who now have more choices on where to advertise). The result is what Robert McChesney has called hypercommercialism; on television, as cable and broadcast networks work to make television programming more conducive to advertisers' interests. Programming now, more than ever before, is tailored to attract and please only those audience segments advertisers care most about. Furthermore, the actual content of the programs are specifically tailored to provide a good environment; for the sponsors' messages!

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These are tough issues. Presume, for a moment, that five corporations did not own all the cable channels in the US TV system. Even if there were more channels on the dial, even if they all were owned by different firms, the competition for advertising revenue forces media firms to bend over backwards to please advertisers with hypercommercial fare (e.g., watch a football game. The advertising is now folded into the game itself. It's logos and slogans on the field, on the uniforms, in the stands, on the jumbotron, in the announcer's mouths every other second. The game itself recedes into the background).

What's the solution? Let's begin with holding the line on consolidation. The answer is not to open the floodgates and let the media giants own more radio stations, more television stations, more newspapers, and more cable systems than they do today. Instead, we need to commit the FCC to promote the goal of more diversity in information and cultural storytelling in the American media system. We can do this by requiring that all networks and cable stations live up to certain public service goals (amount of public affairs programs, more multicultural programming, etc.). We can do this by liberating huge sections of the broadcasting system from the tyranny of advertising. If more channels were supported by public funds, they could produce programs that respond directly to public desires, and to sections of the public not now considered to be important &target markets; for advertisers (including the elderly and the poor). In the current commercial system, we get the programs that advertisers think attract the kinds of audiences they want to reach, and we have to settle for the kinds of content advertisers think will provide an appropriate (and non-controversial) environment for their messages.

We can do better. The FCC can do better. At the least, please preserve the current regulatory restrictions on media ownership.

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